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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

UNITED STATES OF AMERICA

3:20-cr-00506-HZ

v.

HAWAZEN SAMEER MOTHAFAR,

Defendant.

**MOTION TO SEAL EXHIBIT TO
GOVERNMENT'S MOTION TO TAKE
DEPOSITION PURSUANT TO RULE 15
OF THE FEDERAL RULES OF
CRIMINAL PROCEDURE**

The United States of America moves the Court for an order sealing Exhibit 2 to the Government's Motion to Take Deposition Pursuant to Rule 15 of the Federal Rules of Criminal Procedure as Exhibit 2 contains sensitive law enforcement information and public disclosure at this time may result in the endangerment of the life or physical safety of individuals located overseas, the intimidation of potential witnesses, and/or otherwise seriously jeopardize this case and other ongoing investigations.

The government further requests that the government be authorized to provide a copy of Exhibit 2 to the Government's Motion to Take Deposition Pursuant to Rule 15 of the Federal Rules of Criminal Procedure to attorneys for defendant in this case.

Dated: April 29, 2021

Respectfully submitted,

SCOTT ERIK ASPHAUG
Acting United States Attorney

/s/ Ethan D. Knight
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